



State Water Resources Control Board
Division of Drinking Water

December 6, 2017

System No. 1502034

Brian Males, Environmental Manager
California Portland Cement
9350 Oak Creek Road
Mojave, CA 93501

CITATION NO. 03-19-17C-042
E.COLI & TOTAL COLIFORM MAXIMUM CONTAMINANT LEVEL VIOLATION
FOR DECEMBER 2016

Dear Mr. Males,

The State Water Resources Control Board (State Board), Division of Drinking Water has issued Citation No. 03_19_17C_042, for failure to comply with the provisions of the California Health & Safety Code and Title 22, California Code of Regulations. Specifically, the California Portland Cement Water System (Water System) failed the *E.coli* maximum contaminant level (MCL) and the total coliform MCL for the month of December 2016.

The California Safe Drinking Water Act, Section 116577, provides for the State Board to be reimbursed by the public water system for costs incurred for preparing and issuing an enforcement action to that system. Therefore, the Water System has been billed for the preparation and issuance of this citation. The State Board's current billing rate for enforcement activities is \$167 per hour. The hourly rate is subject to review and change upon approval. You will receive a bill for these costs following the end of the State's fiscal year, from our Fee Billing Unit in Sacramento.

Any person who is aggrieved by a citation, order or decision issued by the Deputy Director of the Division of Drinking Water under Article 8 (commencing with Health and Safety Code, Section 116625) or Article 9 (commencing with Health and Safety Code, Section 116650), of the Safe Drinking Water Act (Chapter 4, Part 12, Division 104, of the Health and Safety Code) may file a petition with the State Water Board for reconsideration of the citation, order or decision. Appendix 1 to the enclosed Citation contains the relevant statutory provisions for filing a petition for reconsideration (Health and Safety Code, Section 116701).

Petitions must be received by the State Board within 30 days of the issuance of the citation, order or decision by the Deputy Director. The date of issuance is the date when the Division of Drinking Water mails a copy of the citation, order or decision. If the 30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day. Petitions must be received by 5:00 p.m.

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

4925 Commerce Drive, Suite 120, Bakersfield, CA 93309 | www.waterboards.ca.gov

Information regarding filing petitions may be found at:

http://www.waterboards.ca.gov/drinking_water/programs/petitions/index.shtml

If you have any questions regarding this matter, please contact our office at (661) 335-7315 or via email at dwpdist19@waterboards.ca.gov.

Sincerely,



Jaswinder S. Dhaliwal, P.E.
Senior Sanitary Engineer
DRINKING WATER FIELD OPERATIONS BRANCH

Enclosure: Citation No. 03_19_17C_042

Certified Mail No. 7015 0640 0006 0208 6702

Cc: Kern County Dept. of Public Health, Environmental Health Division (w/out enclosure)
Scott Moore, Seaco, Designated Operator. (via email)

Citation No. 03-19-17C-042

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

Name of Public Water System: California Portland Cement Company

Water System No: 1502034

Attention: Brian Males, Environmental Manager
9350 Oak Creek Road
Mojave, CA 93501

Issued: December 6, 2017

CITATION FOR NONCOMPLIANCE
E.COLI & TOTAL COLIFORM MAXIMUM CONTAMINANT LEVEL
VIOLATION
CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTION 64426.1
December 2016

The California Health and Safety Code (hereinafter "CHSC"), Section 116650 authorizes the State Water Resources Control Board (hereinafter "State Board") to issue a citation to a public water system when the State Board determines that the public water system has violated or is violating the California Safe Drinking Water Act (hereinafter "California SDWA"), (CHSC, Division 104, Part 12, Chapter 4, commencing with Section

1 116270), or any regulation, standard, permit, or order issued or adopted
2 thereunder.

3
4 The State Board, acting by and through its Division of Drinking Water
5 (hereinafter "Division") and the Deputy Director for the Division, hereby
6 issues this citation pursuant to Section 116650 of the CHSC to the California
7 Portland Cement Company Water System (hereinafter "Water System") for
8 violation of CHSC, Section 116555(a)(1) and, California Code of
9 Regulations (hereinafter "CCR"), Title 22, Section 64426.1.

10
11 A copy of the applicable statutes and regulations are included in **Appendix**
12 **1**, which is attached hereto and incorporated by reference.

13 14 **STATEMENT OF FACTS**

15 The Water System is classified as a nontransient-noncommunity water
16 system with a population of 200, serving fourteen (14) connections. The
17 Division received laboratory results for one (1) routine bacteriological
18 sample(s) collected on December 6, 2016, from the distribution system. The
19 sample was analyzed for the presence of total coliform bacteria and the
20 result was positive for total coliform bacteria and negative for *E.coli* bacteria.
21 Four (4) repeat samples were collected on December 9, 2016, from the
22 distribution system and they all tested positive for *E.coli* bacteria. A
23 bacteriological sample collected on December 27, 2016, from Well 06, for
24 complying with the Ground Water Rule (GWR), tested positive for total
25 coliform bacteria and negative for *E.coli* bacteria. A bacteriological sample
26 collected on December 27, 2016, from Well 05-Standby), for GWR
27 compliance tested negative for total coliform bacteria. It is noted by the
28 Division that the GWR compliance samples were not collected within 24

1 hours of receipt of notification of the routine total coliform positive sample
2 collected on December 6, 2016.

3
4 The Water System provided emergency disinfection and flushing of Well 06
5 and distribution system to help clear bacteriological contamination from the
6 well. Afterwards, five (5) routine bacteriological samples were collected on
7 January 26, 2017, from the distribution system, and they all tested negative
8 for total coliform bacteria. Two (2) special samples, collected on January 26,
9 2017, from the 57,000-gallon storage tank and Well 06, tested negative for
10 total coliform bacteria.

11
12 In accordance with the requirements of the federal Revised Total Coliform
13 Rule (rTCR), a Level 2 assessment was conducted by the Division of
14 Drinking Water's staff on January 25, 2017. A copy of the letter dated
15 February 7, 2017, which summarizes the findings of the Level 2
16 assessment, is provided under **Appendix 2**. The main reason for the
17 bacteriological contamination was identified as cross-connection between
18 the potable water and industrial/process water. Accidental opening of two
19 ball valves in the "Quarry Crusher" building caused the process water to
20 enter the Water System's 57,000-gallon potable water storage tank. Based
21 on a response letter received from the Water System, the problem was
22 corrected in accordance with the directives from the Division.

23
24 The Water System failed to notify the Division of the total coliform and *E.coli*
25 MCL violation for December 2016 until Aayush Khurana, Water Resource
26 Control Engineer with the Division conducted a sanitary survey of the Water
27 System on January 10, 2017. On January 11, 2017, the Division issued a
28 Tier 1, Do Not Drink notice to the Water System. A copy of the email dated

1 January 11, 2017, is provided under **Appendix 3**. Notification to the public
2 of the violation of Sections 64426.1(b)(2) and 64426.1(b)(3) was performed
3 by the Water System on January 12, 2017, in conformance with CCR, Title
4 22, Sections 64463.1(a)(1) and 64465. Two consecutive rounds of total
5 coliform negative samples were required to be collected before cancellation
6 of the Do Not Drink notice. Two rounds of total coliform negative samples
7 were collected on January 26, 2017 and February 2, 2017. On March 8,
8 2017, the Division issued a safe water notice to the Water System. All
9 monthly routine samples collected from January to October 2017, have
10 tested negative for total coliform bacteria. A summary of the bacteriological
11 samples collected from January 2016 to October 2017 is provided under
12 **Appendix 4**.

14 DETERMINATION

15 CCR, Title 22, Section 64426.1, states that a public water system is in
16 violation of the total coliform MCL if any repeat sample is positive for total
17 coliform, fecal coliform or *E.coli*.

18
19 The Water System was required to take four (4) repeat bacteriological
20 samples during December 2016 following one (1) total coliform-positive
21 routine sample(s). The results of the analysis of four (4) repeat samples
22 tested positive for *E.coli* and total coliform bacteria. Therefore, the Division
23 has determined that the Water System violated CCR, Title 22, Sections
24 64426.1(b)(2) and 64426.1 (b)(3) during December 2016.

25
26 In accordance with CCR, Title 22, Section 64426.1(c), the Water System
27 was required to contact the Division within 24 hours of the total coliform
28 MCL violation for December 2016, but failed to do so.

In accordance with CCR, Title 22, Section 64426.1(c), the Water System was required to issue Tier 1 public notification (within 24 hours of the violation) for violating Section 64426.1(b)(4) but failed to do so, until the Division became aware of the violation on January 10, 2017.

DIRECTIVES

The **Water System** is hereby directed to take the following actions:

1. Comply with CCR, Title 22, Section 64426.1, in all future monitoring periods.
2. In the future, the Water System shall contact the Division within 24 hours of total coliform MCL violation or *E.coli* MCL violation.
3. In the future, the Water System shall provide public notification of the coliform MCL violations, in accordance with Section 64463.4 for Tier 2 public notification and Section 64463.1 for Tier 1 public notification.
4. In the future, the Water System shall collect the Ground Water Rule sample(s) within 24 hours of the routine total coliform positive sample(s).

All submittals required by this Citation shall be electronically submitted to the Division at the following address. The subject line for all electronic submittals corresponding to this citation shall include the following information: Water System name and number, citation number and title of the document being submitted.

Jaswinder S. Dhaliwal, P.E.
Senior Sanitary Engineer
DWPSDIST19@waterboards.ca.gov

1
2 The State Board reserves the right to make such modifications to this
3 Citation as it may deem necessary to protect public health and safety. Such
4 modifications may be issued as amendments to this Citation and shall be
5 effective upon issuance.

6
7 Nothing in this Citation relieves the Water System of its obligation to meet
8 the requirements of the California SDWA (CHSC, Division 104, Part 12,
9 Chapter 4, commencing with Section 116270), or any regulation, standard,
10 permit or order issued or adopted thereunder.

11 12 **PARTIES BOUND**

13 This Citation shall apply to and be binding upon the Water System, its
14 owners, shareholders, officers, directors, agents, employees, contractors,
15 successors, and assignees.

16 17 **SEVERABILITY**

18 The directives of this Citation are severable, and the Water System shall
19 comply with each and every provision thereof notwithstanding the
20 effectiveness of any provision.

21 22 **FURTHER ENFORCEMENT ACTION**

23 The California SDWA authorizes the State Board to: issue a citation or order
24 with assessment of administrative penalties to a public water system for
25 violation or continued violation of the requirements of the California SDWA
26 or any regulation, permit, standard, citation, or order issued or adopted
27 thereunder including, but not limited to, failure to correct a violation identified
28 in a citation or compliance order. The California SDWA also authorizes the

1 State Board to take action to suspend or revoke a permit that has been
2 issued to a public water system if the public water system has violated
3 applicable law or regulations or has failed to comply with an order of the
4 State Board, and to petition the superior court to take various enforcement
5 measures against a public water system that has failed to comply with an
6 order of the State Board. The State Board does not waive any further
7 enforcement action by issuance of this Citation.

8

9

10  
11 Jaswinder S. Dhaliwal, P.E. Date
12 Senior Sanitary Engineer
13 DRINKING WATER FIELD OPERATIONS BRANCH

14

15 Appendices (4):

16

- 17 1. Applicable Statutes and Regulations
18 2. Findings of Level 2 Assessment- State Board's Letter dated February
19 7, 2017
20 3. State Board's Email dated January 11, 2017, with Tier 1 Public Notice
21 4. Report Showing a Summary of Bacteriological Results (January
22 2016- October 2017)

23

24 Certified Mail No. 7015 0640 0006 0208 6702

APPENDIX 1: APPLICABLE STATUTES AND REGULATIONS FOR CITATION NO. 03-19-17C-042

NOTE: The following language is provided for the convenience of the recipient, and cannot be relied upon as the State of California's representation of the law. The published codes are the only official representation of the law. Regulations related to drinking water are in Titles 22 and 17 of the California Code of Regulations. Statutes related to drinking water are in the Health & Safety Code, the Water Code, and other codes.

California Health and Safety Code (CHSC):

Section 116271 states in relevant part:

(a) The State Water Resources Control Board succeeds to and is vested with all of the authority, duties, powers, purposes, functions, responsibilities, and jurisdiction of the State Department of Public Health, its predecessors, and its director for purposes of all of the following:

- (1) The Environmental Laboratory Accreditation Act (Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101).
- (2) Article 3 (commencing with Section 106875) of Chapter 4 of Part 1.
- (3) Article 1 (commencing with Section 115825) of Chapter 5 of Part 10.
- (4) This chapter and the Safe Drinking Water State Revolving Fund Law of 1997 (Chapter 4.5 (commencing with Section 116760)).
- (5) Article 2 (commencing with Section 116800), Article 3 (commencing with Section 116825), and Article 4 (commencing with Section 116875) of Chapter 5.
- (6) Chapter 7 (commencing with Section 116975).
- (7) The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Division 43 (commencing with Section 75001) of the Public Resources Code).
- (8) The Water Recycling Law (Chapter 7 (commencing with Section 13500) of Division 7 of the Water Code).
- (9) Chapter 7.3 (commencing with Section 13560) of Division 7 of the Water Code.
- (10) The California Safe Drinking Water Bond Law of 1976 (Chapter 10.5 (commencing with Section 13850) of Division 7 of the Water Code).
- (11) Wholesale Regional Water System Security and Reliability Act (Division 20.5 (commencing with Section 73500) of the Water Code).
- (12) Water Security, Clean Drinking Water, Coastal and Beach Protection Act of 2002 (Division 26.5 (commencing with Section 79500) of the Water Code).

(b) The State Water Resources Control Board shall maintain a drinking water program and carry out the duties, responsibilities, and functions described in this section. Statutory reference to "department," "state department," or "director" regarding a function transferred to the State Water Resources Control Board shall refer to the State Water Resources Control Board. This section does not impair the authority of a local health officer to enforce this chapter or a county's election not to enforce this chapter, as provided in Section 116500...

- (k)
- (1) The State Water Resources Control Board shall appoint a deputy director who reports to the executive director to oversee the issuance and enforcement of public water system permits and other duties as appropriate. The deputy director shall have public health expertise.
 - (2) The deputy director is delegated the State Water Resources Control Board's authority to provide notice, approve notice content, approve emergency notification plans, and take other action pursuant to Article 5 (commencing with Section 116450), to issue, renew, reissue, revise, amend, or deny any public water system permits pursuant to Article 7 (commencing with Section 116525), to suspend or revoke any public water system permit pursuant to Article 8 (commencing with Section 116625), and to issue citations, assess penalties, or issue orders pursuant to Article 9 (commencing with Section 116650). Decisions and actions of the deputy director taken pursuant to Article 5 (commencing with Section 116450) or Article 7 (commencing with Section 116525) are deemed decisions and actions taken, but are not subject to reconsideration, by the State Water Resources Control Board. Decisions and actions of the deputy director taken pursuant to Article 8 (commencing with Section 116625) and Article 9 (commencing with Section 116650) are deemed decisions and actions taken by the State Water Resources Control Board, but any aggrieved person may petition the State Water Resources Control Board for reconsideration of the decision or action. This subdivision is not a limitation on the State Water Resources Control Board's authority to delegate any other powers and duties.

Section 116555 states in relevant part:

(a) Any person who owns a public water system shall ensure that the system does all of the following:

- (1) Complies with primary and secondary drinking water standards.
- (2) Will not be subject to backflow under normal operating conditions.
- (3) Provides a reliable and adequate supply of pure, wholesome, healthful, and potable water.

Section 116650 states in relevant part:

- (a) If the state board determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the state board may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.
- (b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.
- (c) A citation may specify a date for elimination or correction of the condition constituting the violation.
- (d) A citation may include the assessment of a penalty as specified in subdivision (e).
- (e) The state board may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation and shall be in addition to any liability or penalty imposed under any other law.

Section 116655 of the CHSC, states in relevant part:

"(a) Whenever the State Board determines that any person has violated or is violating this chapter, or any permit, regulation, or standard issued or adopted pursuant to this chapter, the director may issue an order doing any of the following:

- (1) Directing compliance forthwith.
- (2) Directing compliance in accordance with a time schedule set by the State Board.
- (3) Directing that appropriate preventive action be taken in the case of a threatened violation.

(b) An order issued pursuant to this section may include, but shall not be limited to, any or all of the following requirements:

- (1) That the existing plant, works, or system be repaired, altered, or added to.
- (2) That purification or treatment works be installed.
- (3) That the source of the water supply be changed.
- (4) That no additional service connection be made to the system.
- (5) That the water supply, the plant, or the system be monitored.
- (6) That a report on the condition and operation of the plant, works, system, or water supply be submitted to the State Board."

Section 116701 of the CHSC, states in relevant part:

"(a) Within 30 days of issuance of an order or decision issued by the deputy director under Article 8 (commencing with Section 116625) or Article 9 (commencing with Section 116650), an aggrieved person may petition the state board for reconsideration. Where the order or decision of the deputy director is issued after a hearing under Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, this section shall apply instead of Section 11521 of the Government Code.

(b) The petition shall include the name and address of the petitioner, a copy of the order or decision for which the petitioner seeks reconsideration, identification of the reason the petitioner alleges the issuance of the order was inappropriate or improper, the specific action the petitioner requests, and other information as the state board may prescribe. The petition shall be accompanied by a statement of points and authorities of the legal issues raised by the petition.

(c) The evidence before the state board shall consist of the record before the deputy director and any other relevant evidence that, in the judgment of the state board, should be considered to implement the policies of this chapter. The state board may, in its discretion, hold a hearing for receipt of additional evidence.

(d) The state board may refuse to reconsider the order or decision if the petition fails to raise substantial issues that are appropriate for review, may deny the petition upon a determination that the issuance of the order or decision was appropriate and proper, may set aside or modify the order or decision, or take other appropriate action. The state board's action pursuant to this subdivision shall constitute the state board's completion of its reconsideration.

(e) The state board, upon notice and hearing, if a hearing is held, may stay in whole or in part the effect of the order or decision of the deputy director.

(f) If an order of the deputy director is subject to reconsideration under this section, the filing of a petition for reconsideration is an administrative remedy that must be exhausted before filing a petition for writ of mandate under Section 116625 or 116700."

California Code of Regulations, Title 22 (CCR):

Section 64421 (General Requirements) states:

(a) Each water supplier shall:

- (1) Develop a routine sample siting plan as required in section 64422;
- (2) Collect routine, repeat and replacement samples as required in Sections 64423, 64424, and 64425;
- (3) Have all samples analyzed by laboratories approved to perform those analyses by the State Board and report results as required in section 64423.1;

- (4) Notify the State Board when there is an increase in coliform bacteria in bacteriological samples as required in section 64426; and
- (5) Comply with the Maximum Contaminant Level as required in section 64426.1.
- (b) Water suppliers shall perform additional bacteriological monitoring as follows:
 - (1) After construction or repair of wells;
 - (2) After main installation or repair;
 - (3) After construction, repair, or maintenance of storage facilities; and
 - (4) After any system pressure loss to less than five psi. Samples collected shall represent the water quality in the affected portions of the system.

Section 64422 (Routine Sample Siting Plan) states:

- (a) By September 1, 1992, each water supplier shall develop and submit to the State Board a siting plan for the routine collection of samples for total coliform analysis, subject to the following:
 - (1) The sample sites chosen shall be representative of water throughout the distribution system including all pressure zones, and areas supplied by each water source and distribution reservoir.
 - (2) The water supplier may rotate sampling among the sample sites if the total number of sites needed to comply with (a)(1) above exceeds the number of samples required according to Table 64423-A. The rotation plan shall be described in the sample siting plan.
- (b) If personnel other than certified operators will be performing field tests and/or collecting samples, the sample siting plan shall include a declaration that such personnel have been trained, pursuant to §64415 (b).
- (c) The supplier shall submit an updated plan to the State Board at least once every ten years and at any time the plan no longer ensures representative monitoring of the system.

Section 64423 (Routine Sampling) states:

- (a) Each water supplier shall collect routine bacteriological water samples as follows:
 - (1) The minimum number of samples for community water systems shall be based on the known population served or the total number of service connections, whichever results in the greater number of samples, as shown in Table 64423-A. A community water system using groundwater which serves 25-1000 persons may request from the State Board a reduction in monitoring frequency. The minimum reduced frequency shall not be less than one sample per quarter.
 - (2) The minimum number of samples for nontransient-noncommunity water systems shall be based on the known population served as shown in Table 64423-A during those months when the system is operating. A nontransient-noncommunity water system using groundwater which serves 25-1000 persons may request from the State Board a reduction in monitoring frequency if it has not violated the requirements in this article during the past twelve months. The minimum reduced frequency shall not be less than one sample per quarter.
 - (3) The minimum number of samples for transient-noncommunity water systems using groundwater and serving 1000 or fewer persons a month shall be one in each calendar quarter during which the system provides water to the public.
 - (4) The minimum number of samples for transient-noncommunity water systems using groundwater and serving more than 1000 persons during any month shall be based on the known population served as shown in Table 64423-A, except that the water supplier may request from the State Board a reduction in monitoring for any month the system serves 1000 persons or fewer. The minimum reduced frequency shall not be less than one sample in each calendar quarter during which the system provides water to the public.
 - (5) The minimum number of samples for transient-noncommunity water systems using approved surface water shall be based on the population served as shown in Table 64423-A. A system using groundwater under the direct influence of surface water shall begin monitoring at this frequency by the end of the sixth month after the State Board has designated the source to be approved surface water.
 - (6) A public water system shall collect samples at regular time intervals throughout the month, except that a system using groundwater which serves 4,900 persons or fewer may collect all required samples on a single day if they are taken from different sites.
- (b) In addition to the minimum sampling requirements, all water suppliers using approved surface water which do not practice treatment in compliance with Sections 64650 through 64666, shall collect a minimum of one sample before or at the first service connection each day during which the turbidity level of the water delivered to the system exceeds 1 NTU. The sample shall be collected within 24 hours of the exceedance and shall be analyzed for total coliforms. If the water supplier is unable to collect and/or analyze the sample within the 24-hour time period because of extenuating circumstances beyond its control, the supplier shall notify the State Board within the 24-hour time period and may request an extension. Sample results shall be included in determining compliance with the MCL for total coliforms in Section 64426.1.
- (c) If any routine, repeat, or replacement sample is total coliform-positive, then the water supplier shall collect repeat samples in accordance with Section 64424 and comply with the reporting requirements specified in Sections 64426 and 64426.1.

Table 64423-A
Minimum Number of Routine Total Coliform Samples

Monthly Population Served	Service Connections	Minimum Number of Samples
25 to 1000	15 to 400	1 per month

1,001 to 2,500	401 to 890	2 per month
2,501 to 3,300	891 to 1,180	3 per month
3,301 to 4,100	1,181 to 1,460	4 per month
4,101 to 4,900	1,461 to 1,750	5 per month
4,901 to 5,800	1,751 to 2,100	6 per month
5,801 to 6,700	2,101 to 2,400	7 per month
6,701 to 7,600	2,401 to 2,700	2 per week
7,601 to 12,900	2,701 to 4,600	3 per week
12,901 to 17,200	4,601 to 6,100	4 per week
17,201 to 21,500	6,101 to 7,700	5 per week
21,501 to 25,000	7,701 to 8,900	6 per week
25,001 to 33,000	8,901 to 11,800	8 per week
33,001 to 41,000	11,801 to 14,600	10 per week
41,001 to 50,000	14,601 to 17,900	12 per week
50,001 to 59,000	17,901 to 21,100	15 per week
59,001 to 70,000	21,101 to 25,000	18 per week
70,001 to 83,000	25,001 to 29,600	20 per week
83,001 to 96,000	29,601 to 34,300	23 per week
96,001 to 130,000	34,301 to 46,400	25 per week
130,001 to 220,000	46,401 to 78,600	30 per week
220,001 to 320,000	78,601 to 114,300	38 per week
320,001 to 450,000	114,301 to 160,700	50 per week
450,001 to 600,000	160,701 to 214,300	55 per week
600,001 to 780,000	214,301 to 278,600	60 per week
780,001 to 970,000	278,601 to 346,400	70 per week
970,001 to 1,230,000	346,401 to 439,300	75 per week
1,230,001 to 1,520,000	439,301 to 542,900	85 per week
1,520,001 to 1,850,000	542,901 to 660,700	90 per week
1,850,001 to 2,270,000	660,701 to 810,700	98 per week
2,270,001 to 3,020,000	810,701 to 1,078,600	105 per week
3,020,001 to 3,960,000	1,078,601 to 1,414,300	110 per week
3,960,001 or more	1,414,301 or more	120 per week

Section 64423.1 (Sample Analysis and Reporting of Results) states:

(a) The water supplier shall designate (label) each sample as routine, repeat, replacement, or "other" pursuant to Section 64421(b), and have each sample analyzed for total coliforms. The supplier also shall require the laboratory to analyze the same sample for fecal coliforms or *Escherichia coli* (*E. coli*) whenever the presence of total coliforms is indicated. As a minimum, the analytical results shall be reported in terms of the presence or absence of total or fecal coliforms, or *E. coli* in the sample, whichever is appropriate.

(b) The water supplier shall require the laboratory to notify the supplier within 24 hours, whenever the presence of total coliforms, fecal coliforms or *E. coli* is demonstrated in a sample or a sample is invalidated due to interference problems, pursuant to Section 64425(b), and shall ensure that a contact person is available to receive these analytical results 24-hours a day. The water supplier shall also require the laboratory to immediately notify the State Board of any positive bacteriological results if the laboratory cannot make direct contact with the designated contact person within 24 hours.

(c) Analytical results of all required samples collected for a system in a calendar month shall be reported to the State Board not later than the tenth day of the following month, as follows:

(1) The water supplier shall submit a monthly summary of the bacteriological monitoring results to the State Board.

(2) For systems serving fewer than 10,000 service connections or 33,000 persons, the water supplier shall require the laboratory to submit copies of all required bacteriological monitoring results directly to the State Board.

(3) For systems serving more than 10,000 service connections, or 33,000 persons, the water supplier shall require the laboratory to submit copies of bacteriological monitoring results for all positive routine samples and all repeat samples directly to the State Board.

(d) Laboratory reports shall be retained by the water supplier for a period of at least five years and shall be made available to the State Board upon request.

Section 64424 (Repeat Sampling) states in relevant part:

(a) If a routine sample is total coliform-positive, the water supplier shall collect a repeat sample set as described in paragraph (1) within 24 hours of being notified of the positive result. The repeat samples shall all be collected within the same 24 hour time period. A single service connection system may request that the State Board allow the collection of the repeat sample set over a four-day period.

- (1) For a water supplier that normally collects more than one routine sample a month, a repeat sample set shall be at least three samples for each total coliform-positive sample. For a water supplier that normally collects one or fewer samples per month, a repeat sample set shall be at least four samples for each total coliform-positive sample.
- (2) If the water supplier is unable to collect the samples within the 24-hour time period specified in subsection (a) or deliver the samples to the laboratory within 24 hours after collection because of circumstances beyond its control, the water supplier shall notify the State Board within 24 hours. The State Board will then determine how much time the supplier will have to collect the repeat samples.
- (b) When collecting the repeat sample set, the water supplier shall collect at least one repeat sample from the sampling tap where the original total coliform-positive sample was taken. Other repeat samples shall be collected within five service connections upstream or downstream of the original site. At least one sample shall be from upstream and one from downstream unless there is no upstream and/or downstream service connection.
- (c) If one or more samples in the repeat sample set is total coliform-positive, the water supplier shall collect and have analyzed an additional set of repeat samples as specified in subsections (a) and (b). The supplier shall repeat this process until either no coliforms are detected in one complete repeat sample set or the supplier determines that the MCL for total coliforms specified in Section 64426.1 has been exceeded and notifies the State Board.
- (d) If a public water system for which fewer than five routine samples/month are collected has one or more total coliform-positive samples, the water supplier shall collect at least five routine samples the following month. If the supplier stops supplying water during the month after the total coliform-positive(s), at least five samples shall be collected during the first month the system resumes operation. A water supplier may request the State Board waive the requirement to collect at least five routine samples the following month, but a waiver will not be granted solely on the basis that all repeat samples are total coliform-negative. To request a waiver, one of the following conditions shall be met:
- (1) The State Board conducts a site visit before the end of the next month the system provides water to the public to determine whether additional monitoring and/or corrective action is necessary to protect public health.
 - (2) The State Board determines why the sample was total coliform-positive and establishes that the system has corrected the problem or will correct the problem before the end of the next month the system serves water to the public. If a waiver is granted, a system shall collect at least one routine sample before the end of the next month it serves water to the public and use it to determine compliance with Section 64426.1.

Section 64425 (Sample Invalidation) states:

- (a) A water supplier may request the Department to invalidate a sample for which a total coliform-positive result has been reported if the supplier demonstrates:
- (1) All repeat sample(s) collected at the same tap as the original total coliform-positive sample also are total coliform-positive and all repeat samples collected within five service connections of the original tap are not total coliform-positive; or
 - (2) The laboratory did not follow the prescribed analytical methods pursuant to §64415(a), based on a review of laboratory documentation by the Department. The supplier shall submit to the Department a written request for invalidation along with the laboratory documentation, the supplier's sample collection records and any observations noted during sample collection and delivery. The water supplier shall require the laboratory to provide the supplier with documentation which shall include, but not be limited to:
 - (A) A letter from the director of the laboratory having generated the data, confirming the invalidation request by reason of laboratory accident or error;
 - (B) Complete sample identification, laboratory sample log number (if used), date and time of collection, date and time of receipt by the laboratory, date and time of analysis for the sample(s) in question;
 - (C) Complete description of the accident or error alleged to have invalidated the result(s);
 - (D) Copies of all analytical, operating, and quality assurance records pertaining to the incident in question; and
 - (E) Any observations noted by laboratory personnel when receiving and analyzing the sample(s) in question.
- (b) Whenever any total coliform sample result indicative of the absence of total coliforms has been declared invalid by the laboratory due to interference problems as specified at 40 Code Federal Regulations, Section 141.2100(c)(2), the supplier shall collect a replacement sample from the same location as the original sample within 24 hours of being notified of the interference problem, and have it analyzed for the presence of total coliforms. The supplier shall continue to re-sample at the original site within 24 hours and have the samples analyzed until a valid result is obtained.

Section 64426 (Significant Rise in Bacterial Count) states in relevant part:

- (a) Any of the following criteria shall indicate a possible significant rise in bacterial count:
- (1) A system collecting at least 40 samples per month has a total coliform-positive routine sample followed by two total coliform-positive repeat samples in the repeat sample set;
 - (2) A system has a sample which is positive for fecal coliform or E. coli; or
 - (3) A system fails the total coliform Maximum Contaminant Level (MCL) as defined in Section 64426.1.
- (b) When the coliform levels specified in subsection (a) are reached or exceeded, the water supplier shall:

- (1) Contact the State Board by the end of the day on which the system is notified of the test result or the system determines that it has exceeded the MCL, unless the notification or determination occurs after the State Board office is closed, in which case the supplier shall notify the State Board within 24 hours; and
- (2) Submit to the State Board information on the current status of physical works and operating procedures which may have caused the elevated bacteriological findings, or any information on community illness suspected of being waterborne. This shall include, but not be limited to:

- (A) Current operating procedures that are or could potentially be related to the increase in bacterial count;
- (B) Any interruptions in the treatment process;
- (C) System pressure loss to less than 5 psi;
- (D) Vandalism and/or unauthorized access to facilities;
- (E) Physical evidence indicating bacteriological contamination of facilities;
- (F) Analytical results of any additional samples collected, including source samples;
- (G) Community illness suspected of being waterborne; and
- (H) Records of the investigation and any action taken.

Section 64426.1 (Total Coliform Maximum Contaminant Level (MCL)) states in relevant part:

(b) A public water system is in violation of the total coliform MCL when any of the following occurs:

- (1) For a public water system which collects at least 40 samples per month, more than 5.0 percent of the samples collected during any month are total coliform-positive; or
- (2) For a public water system which collects fewer than 40 samples per month, more than one sample collected during any month is total coliform-positive; or
- (3) Any repeat sample is fecal coliform-positive or E. coli-positive; or
- (4) Any repeat sample following a fecal coliform-positive or E. coli-positive routine sample is total coliform-positive.

(c) If a public water system is not in compliance with paragraphs (b)(1) through (4), during any month in which it supplies water to the public, the water supplier shall notify the State Board by the end of the business day on which this is determined, unless the determination occurs after the State Board office is closed, in which case the supplier shall notify the State Board within 24 hours of the determination. The water supplier shall also notify the consumers served by the water system. A Tier 2 Public Notice shall be given for violations of paragraph (b)(1) or (2), pursuant to section 64463.4. A Tier 1 Public Notice shall be given for violations of paragraph (b)(3) or (4), pursuant to section 64463.1.

Section 64463.1 (Tier 1 Public Notice) states in relevant part:

(a) A water system shall give public notice pursuant to this section and section 64465 if any of the following occurs:

- (1) Violation of the total coliform MCL when:
 - (A) Fecal coliform or E. coli are present in the distribution system; or
 - (B) When any repeat sample tests positive for coliform and the water system fails to test for fecal coliforms or E. coli in the repeat sample;...

(b) As soon as possible within 24 hours after learning of any of the violations in subsection (a) or being notified by the State Board that it has determined there is a potential for adverse effects on human health [pursuant to paragraph (a)(4), (5), or (6)], the water system shall:

- (1) Give public notice pursuant to this section;
- (2) Initiate consultation with the State Board within the same timeframe; and
- (3) Comply with any additional public notice requirements that are determined by the consultation to be necessary to protect public health.

(c) A water system shall deliver the public notice in a manner designed to reach residential, transient, and nontransient users of the water system and shall use, as a minimum, one of the following forms:

- (1) Radio or television;
- (2) Posting in conspicuous locations throughout the area served by the water system;
- (3) Hand delivery to persons served by the water system; or
- (4) Other method approved by the State Board, based on the method's ability to inform water system users.

Section 64463.4 (Tier 2 Public Notice) states:

(a) A water system shall give public notice pursuant to this section if any of the following occurs:

- (1) Any violation of the MCL, MRDL, and treatment technique requirements, except:
 - (A) Where a Tier 1 public notice is required under section 64463.1; or
 - (B) Where the State Board determines that a Tier 1 public notice is required, based on potential health impacts and persistence of the violations;
- (2) All violations of the monitoring and testing procedure requirements in sections 64421 through 64426.1, article 3 (Primary Standards – Bacteriological Quality), for which the State Board determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations;
- (3) Other violations of the monitoring and testing procedure requirements in this chapter, and chapters 15.5, 17 and 17.5, for which the State Board determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations; or

(4) Failure to comply with the terms and conditions of any variance or exemption in place.

(b) A water system shall give the notice as soon as possible within 30 days after it learns of a violation or occurrence specified in subsection (a), except that the water system may request an extension of up to 60 days for providing the notice. This extension would be subject to the State Board's written approval based on the violation or occurrence having been resolved and the State Board's determination that public health and welfare would in no way be adversely affected. In addition, the water system shall:

(1) Maintain posted notices in place for as long as the violation or occurrence continues, but in no case less than seven days;

(2) Repeat the notice every three months as long as the violation or occurrence continues. Subject to the State Board's written approval based on its determination that public health would in no way be adversely affected, the water system may be allowed to notice less frequently but in no case less than once per year. No allowance for reduced frequency of notice shall be given in the case of a total coliform MCL violation or violation of a Chapter 17 treatment technique requirement; and

(3) For turbidity violations pursuant to sections 64652.5(c)(2) and 64653(c), (d) and (f), as applicable, a water system shall consult with the State Board as soon as possible within 24 hours after the water system learns of the violation to determine whether a Tier 1 public notice is required. If consultation does not take place within 24 hours, the water system shall give Tier 1 public notice within 48 hours after learning of the violation.

(c) A water system shall deliver the notice, in a manner designed to reach persons served, within the required time period as follows:

(1) Unless otherwise directed by the State Board in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, community water systems shall give public notice by:

(A) Mail or direct delivery to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system; and

(B) Use of one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, university students, nursing home patients, prison inmates, etc.):

1. Publication in a local newspaper;
2. Posting in conspicuous public places served by the water system, or on the Internet; or
3. Delivery to community organizations.

(2) Unless otherwise directed by the State Board in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, noncommunity water systems shall give the public notice by:

(A) Posting in conspicuous locations throughout the area served by the water system; and

(B) Using one or more of the following methods to reach persons not likely to be reached by a public posting:

1. Publication in a local newspaper or newsletter distributed to customers;
2. E-mail message to employees or students;
3. Posting on the Internet or intranet; or
4. Direct delivery to each customer.

Section 64465 (Public Notice Content and Format) states in relevant part:

(a) Each public notice given pursuant to this article, except Tier 3 public notices for variances and exemptions pursuant to subsection (b), shall contain the following:

(1) A description of the violation or occurrence, including the contaminant(s) of concern, and (as applicable) the contaminant level(s);

(2) The date(s) of the violation or occurrence;

(3) Any potential adverse health effects from the violation or occurrence, including the appropriate standard health effects language from appendices 64465-A through G;

(4) The population at risk, including subpopulations particularly vulnerable if exposed to the contaminant in drinking water;

(5) Whether alternative water supplies should be used;

(6) What actions consumers should take, including when they should seek medical help, if known;

(7) What the water system is doing to correct the violation or occurrence;

(8) When the water system expects to return to compliance or resolve the occurrence;

(9) The name, business address, and phone number of the water system owner, operator, or designee of the water system as a source of additional information concerning the public notice;

(10) A statement to encourage the public notice recipient to distribute the public notice to other persons served, using the following standard language: —Please share this information with all the other people who drink this water, especially those who may not have received this public notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail; and

(11) For a water system with a monitoring and testing procedure violation, this language shall be included: "We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not your drinking water meets health standards. During

[compliance period dates], we ['did not monitor or test' or 'did not complete all monitoring or testing'] for [contaminant(s)], and therefore, cannot be sure of the quality of your drinking water during that time." ...

(c) A public water system providing notice pursuant to this article shall comply with the following multilingual-related requirements:

(2) For a Tier 2 or Tier 3 public notice:

(A) The notice shall contain information in Spanish regarding the importance of the notice, or contain a telephone number or address where Spanish-speaking residents may contact the public water system to obtain a translated copy of the notice or assistance in Spanish; and

(B) When a non-English speaking group other than Spanish-speaking exceeds 1,000 residents or 10 percent of the residents served by the public water system, the notice shall include:

1. Information in the appropriate language(s) regarding the importance of the notice; or
2. A telephone number or address where such residents may contact the public water system to obtain a translated copy of the notice or assistance in the appropriate language; and

(3) For a public water system subject to the Dymally-Alatorre Bilingual Services Act, Chapter 17.5, Division 7, of the Government Code (commencing with section 7290), meeting the requirements of this Article may not ensure compliance with the Dymally-Alatorre Bilingual Services Act.

(d) Each public notice given pursuant to this article shall:

- (1) Be displayed such that it catches people's attention when printed or posted and be formatted in such a way that the message in the public notice can be understood at the eighth-grade level;
- (2) Not contain technical language beyond an eighth-grade level or print smaller than 12 point; and
- (3) Not contain language that minimizes or contradicts the information being given in the public notice.

Appendix 64465-A. Health Effects Language - Microbiological Contaminants.

Contaminant	Health Effects Language
Total Coliform	Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.
Fecal coliform/E. coli	Fecal coliforms and E. coli are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems.
Turbidity	Turbidity has no health effects. However, high levels of turbidity can interfere with disinfection and provide a medium for microbial growth. Turbidity may indicate the presence of disease-causing organisms. These organisms include bacteria, viruses, and parasites that can cause symptoms such as nausea, cramps, diarrhea, and associated headaches.

Section 64469 (Reporting Requirements) states in relevant part:

(d) Within 10 days of giving initial or repeat public notice pursuant to Article 18 of this Chapter, except for notice given under section 64463.7(d), each water system shall submit a certification to the State Board that it has done so, along with a representative copy of each type of public notice given.

Section 64481 (Content of the Consumer Confidence Report) states in relevant part:

(g) For the year covered by the report, the Consumer Confidence Report shall note any violations of paragraphs (1) through (7) and give related information, including any potential adverse health effects, and the steps the system has taken to correct the violation.

(1) Monitoring and reporting of compliance data.

APPENDIX 2. Findings of Level 2 Assessment- State Board's Letter dated February 7, 2017
For Citation No. 03_19_17C_042



State Water Resources Control Board
Division of Drinking Water

February 7, 2017

Brian Males, Environmental Manager
CalPortland Cement Company
9350 Oak Creek Road
Mojave, CA 93501

SUBJECT: LEVEL 2 ASSESSMENT OF THE CALPORTLAND CEMENT COMPANY WATER SYSTEM (SYSTEM NO. 1502034)

Mr. Males:

On January 25, 2017, Aayush Khurana, Water Resource Control Engineer with the State Water Resources Control Board (hereinafter State Board), Division of Drinking Water, inspected the CalPortland Cement Company Water System (hereinafter Water System) to complete a Level 2 Assessment. Scott Moore, designated certified distribution operator, recently contracted by the Water System from Seaco Technologies, was also present during the assessment.

Under the federal revised Total Coliform Rule (rTCR), a Level 2 Assessment is required if a water system has an *E.coli* MCL violation or a second Level 1 treatment technique trigger, within a rolling 12-month period, for total coliform. It is noted that a routine monthly sample collected on December 6, 2016, from the distribution system, tested positive for total coliform bacteria and negative for *E.coli* bacteria. On December 9, 2016, the Water System collected four (4) repeat samples from the distribution system, and all four (4) repeat samples tested positive for total coliform and *E. coli* bacteria. The State Board determined that the Water System violated the *E.coli* MCL for the month of December 2016, triggering Level 2 Assessment. The purpose of the Level 2 Assessment is to thoroughly review operation of the Water System, sampling procedures, condition of the domestic water supply facilities, and identify a possible cause of the total coliform and *E.coli* positive samples and corrective actions taken/needed.

Level 2 Assessment Findings

A copy of the completed Level 2 Assessment Form is provided in **Enclosure A**. The likely cause of *E.coli* positive samples in the distribution system may be due to high flows of process/industrial water through the 57,000-gallon potable water storage tank, leading to a cross-connection between the potable water and process (industrial) water. High flows occurred in October 2016, due to accidental opening of two ball valves located in the "Quarry Crusher" building. This caused the process water to enter the storage tank. Following issuance of a "Do Not Drink" notice on January 11, 2017, you submitted an investigative report on January 23, 2017, to the State Board, describing the timeline of events that led to the total coliform and *E.coli* positive samples. A copy of this report is provided in **Enclosure B**.

Mr. Khurana conducted a sanitary survey of the Water System on January 10, 2017, prior to the Level 2 Assessment. A To-Do List was sent to you on January 11, 2017, by the State Board, following the survey. The list includes other physical deficiencies in the Water System that may have caused the E.coli MCL violation and must be addressed as well. In addition to the items mentioned in the To-Do List, additional physical deficiencies were found during the Level 2 Assessment. Below are the recommendations on how to abate these deficiencies. Pictures taken during the Level 2 Assessment are provided in **Enclosure C**.

- 1) Add a protective screen to the overflow/drain line outlet of the storage tank. *See Picture 2.*
- 2) Replace the valve on inlet line of the tank in the booster station room. The valve is severely rusted and leaking. *See Picture 3.*

Within two weeks of this letter and no later than February 28, 2017, the deficiencies identified above should be corrected. Please note that a written response to the letter that the State Board sent to you on January 11, 2017, is due on February 11, 2017. Please provide an update on the status of the two above-mentioned items in your upcoming response. After review of your response, the State Board will make a determination about cancellation of the *Do Not Drink* notice.

If you have any questions concerning the issues discussed in this letter, please contact Aayush Khurana at (661) 335-7346.

Sincerely,



Jaswinder S. Dhaliwal, P.E.
Senior Sanitary Engineer
TEHACHAPI DISTRICT

ENCLOSURES

Enclosure A: Level 2 Assessment Form
Enclosure B: Investigative Report by Brian Males
Enclosure C: Level 2 Assessment Pictures Taken on January 25, 2017

cc: Kern County Dep. of Public Health, Environmental Health Services Division (w/o enclosures)
Scott Moore, Seaco Technologies, Inc. (via e-mail)

Enclosure A

Level 2 Assessment Form

REVISED TOTAL COLIFORM RULE (RCR) - LEVEL 2 ASSESSMENT

This form is intended to assist Division of Drinking Water (DDW) or Local Primacy Agency (LPA) Staff in completing the investigation required by the federal revised Total Coliform Rule (RCR) [effective April 1, 2016]. If the answer has a large number in the description. The PWS must address each issue described in the Corrective Action column. To avoid a violation, the water system must submit to DDW/LPA a completed assessment report no later than 30 days after the trigger date.



PWS ID#: 1502034		PWS Name: CALIFORNIA PORTLAND CEMENT CO.		Circle one: CWS <input checked="" type="radio"/> NTNCT TNC		
Operator in Responsible Charge (print name): BRIAN MALES		Phone: _____				
Assessment trigger date: _____		Date Assessment Completed: 1/25/2017				
SEASONAL: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		Reason for Assessment: <u>ECOF Positive</u>				
Person who collected TC positive samples: Chris		Contact info for person who collected samples: <u>Zalco Labs</u>				
Name of Certified Lab conducting sample analysis: <u>ZALCO LABS</u>						
Assessment Elements		Y	N	N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
1. Review of the sample sites		Y	N	N/A	Indicate Element number being described.	Indicate Element number being described.
1.1	Was the sample taken at the routine coliform site? List the name(s) of the positive sample site(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>1.1 Safety Sink. Although December</u>	
1.2	Was the tap area unsanitary at the time of sampling?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>structure is supposed to be tank</u>	
1.3	Was this sample taken from an outside faucet?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>inside</u>	
1.4	Was the sample taken from a swivel tap?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
1.5	Did the tap have a point of use treatment device on it?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
1.6	Does the building where the sample was taken have a point of entry device?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
1.7	Has this location undergone any plumbing replacements or repairs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>1.7 Quarry crusher valves were closed</u>	
1.8	Are there any possible cross connections around the sample site (including yard hydrants and stock tanks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Pending re-connection survey</u>	
1.9	Is this location near a storage tank or dead end?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
1.10	Have there been any analytical results or any additional samples collected, including source samples, which were positive (not for compliance)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>1.10 T.C. positive in well 06 on 12/23/2016</u>	
1.11	Prior to this incident, when was the most recent satisfactory coliform samples taken?	11/05/2016				
1.12	Any other sample site issues not previously mentioned?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

REVISED TOTAL COLIFORM RULE (RTCR) – LEVEL 2 ASSESSMENT

2. Review of sample protocol		Y	N	N/A	Indicate Element number being described.	Indicate Element number being described.
2.1	Was the positive sample(s) taken by the operator in responsible charge? Provide name of sampler.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Megan (Chris' supervisor)	
2.2	Is the sampler a regular, trained sampler?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
2.3	Was a laboratory-provided TC sample bottle used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
2.4	Was the aerator removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	aerator not present	
2.5	Was the water tap flushed for at least 5 minutes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
2.6	Was the tap disinfected or flamed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cl ₂ disinfected	
2.7	Did the sample get too warm prior to being placed on ice?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2.8	Were there other sampler errors? Describe	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Not according to Megan	
2.9	If it is a seasonal system, were there any problems during the most recent start-up procedure?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
2.10	Any other sample protocol issues not previously mentioned (e.g. vandalism or unauthorized access)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3. Review of the distribution system.		Y	N	N/A	Indicate Element number being described.	Indicate Element number being described.
3.1	Have any mains or service lines recently been repaired, replaced or installed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3-1 No	
3.2	Have fire hydrants or blow offs been recently flushed/used/sheared?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Flushed (testing for x-connection) after Jostine	
3.3	Have valves been recently exercised to direct flow?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	33	
3.4	Any leaks or main breaks noted?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3.5	Are all of the backflow prevention devices operational and maintained?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	not inspected annually	
3.6	Was there a total loss of pressure, low pressure (<20 psi) or changes in water pressure? If yes, when?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	head of October tank levels low	
3.7	Any areas of the distribution with low disinfectant levels (<0.2 mg/L)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3.8	Any recent pump station failures or repairs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3.9	Air relief valve leaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3.10	Standing water or debris in (air relief) valve vault?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3.11	Any recent power loss?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3.12	Any unprotected cross connections (including yard hydrants and stock tanks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	→ pending x-connection survey	
3.13	Has high turbidity been detected in the distribution system?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
3.14	Is there evidence of intentional contamination or vandalism?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3.15	Any other distribution issue not previously mentioned (e.g. other O&M activities that could have introduced coliforms)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

REVISED TOTAL COLIFORM RULE (RTCIR) – LEVEL 2 ASSESSMENT

4. Review of storage tank(s) (Note the specific facility if any issues are found)		Y	N	N/A	Indicate Element number being described.	Indicate Element number being described.
4.1	Is there a presence of animals or insects in the tank(s)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.2	Are there breaches or holes of any sort into tank(s)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.3	Is there any presence of animal droppings around openings, vents or overflows?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.4	Is there sediment buildup and floating debris in tank(s)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.5	Have the tank(s) been cleaned within the last 5 years? If not, list when it was last cleaned.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.6	Are the vents and overflows protected against entry from animals, insects or other contaminants?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.7	Are the screens damaged or not properly installed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.8	Does the reservoir have a common inlet/outlet?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.9	Is the overflow pipe directly connected to a tank drain, sanitary sewer or storm drain?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.10	Does the hatch have a solid, water proof, shoebox type lid that is properly sealed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.11	Was the hatch locked or secured?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.12	Has the tank been accidentally drained?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.13	Have there been high flows through the tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.14	Was there high water age in the tank (infrequent water use)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.15	Was the sample taken when the tank was at the low level mark?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.16	Failure or improper operation on tank telemetry/altitude valves/controls?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
4.17	Any recent repairs on the tank(s)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.18	Was there any power loss?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.19	Is the site secured (e.g. fencing, locked gates, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4.20	Was the tank vandalized or subject to tampering?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.21	Any other storage tank issues not previously mentioned above?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Pressure Tanks (if applicable)		Y	N	N/A	Indicate Element number being described.	Indicate Element number being described.
4.22	What is the volume of the pressure tank? Attach additional sheets if needed.					
4.23	What is the age of the pressure tank? Attach additional sheets if needed.					
4.24	Does the pressure tank use a bladder and/or air compressor? Attach additional sheets if needed.					
4.25	Did the pressure tank(s) deviate from normal operating pressure?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4.26	Is the compressor pump running more than normal?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		

Unknown

opened quarry crusher valves

Est. 120 gallons x 2 tanks

Unknown

Bladder

REVISED TOTAL COLIFORM RULE (RTCR) - LEVEL 2 ASSESSMENT

4.27	Is the tank bladder water logged?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
4.28	Is the tank damaged, rusty, leaking or have holes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
4.29	Was there any recent work performed on the tank?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
4.30	Is the air relief vent (if there one) screened and facing down?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
4.31	Can the inside of the pressure tank be visually inspected through an inspection port? If so, when was it last inspected?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			check
5.	Review of treatment process (if applicable)	Y	N	N/A			Indicate Element number being described.
5.1	Has the treatment been bypassed altogether at any time or have individual processes been interrupted by power outages or other causes? If yes, provide details on when, which processes and for how long?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			Chlorinator was off when tank levels were low
5.2	Have there been any new treatment processes added or new equipment installed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			future change of pump
5.3	Have there been any recent repairs of major unit processes or treatment equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			tuned off when tank level low
5.4	Have there been any changes in the operational procedures used for treating the water such as, changes in chemical dosages, flow changes, or changes in coagulant chemicals used? If yes, provide details of the change and when it occurred.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			→ no history of well data
5.5	Has a coagulant been added at all times the plant has been filtering water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
5.6	Have there been changes in raw water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
5.7	Was the settled water turbidity increasing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
5.8	Was the finished water turbidity increasing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
5.9	Have filter clogging algae caused more frequent backwashing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
5.10	Have there been any failures in adding disinfectant for any length of time?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
5.11	Was water delivered that did not meet CT requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
5.12	What is the entry point chlorine residual today?						
5.13	Free/Total?						
5.13	Has there been any vandalism or tampering at the plant?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
5.14	Any other treatment plant issues not previously mentioned above?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			
6.	Sources - Well(s)	Y	N	N/A			Indicate Element number being described.
6.1	(Note the specific facility if any issues are found) Is there a 50 foot annular seal?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			6.1 20 foot cement annular seal
6.2	Is the surface seal defective or damaged or not water tight?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

REVISED TOTAL COLIFORM RULE (RCR) - LEVEL 2 ASSESSMENT

		Primary		Backup	Emergency
6.3	Is there a casing vent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	Does the casing and/or air relief vent have a screen to prevent the entry of insects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.5	Does the vent and pump to waste terminate in an air gap of at least three pipe diameters above the ground?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.6	How is the well used? (Circle if applicable)				
6.7	Are there any unprotected cross connections at the wellhead?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.8	Are there any unprotected openings in the pump or pump assembly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.9	Is the pitless adapter damaged?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.10	Are there any exposed holes or cracks near the wellhead? For example electric conduit.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.11	Has there been any recent work performed on the pump?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.12	Is the wellhead secured to prevent unauthorized access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.13	Have there been any sewer spills, source water spills or other disturbances near the well?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.14	Is the wellhead at least 18-inches above grade?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.15	Is there evidence of standing water near the wellhead?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.16	Is the well pit in standing water or evidence of flooding?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.17	Any other well issues not previously mentioned above?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sources- Spring(s) (Note the specific facility if any issues are found)		Y	N	N/A	
6.18	Is there evidence of flooding or infiltration of surface water runoff around the spring?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.19	Is the spring box improperly developed or poorly maintained?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.20	Is the spring site secured (e.g. locks, fence, gate, etc).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.21	Are there dead animals near the spring?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.22	Any other issues about springs not previously mentioned above?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sources - Surface Water		Y	N	N/A	
6.23	Have there been algae blooms?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.24	Has the source water turned over?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.25	Have there been any sewer spills, source water spills or other disturbances?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.26	Any other source water issues not previously mentioned above?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Submersible

REVISED TOTAL COLIFORM RULE (RTCRR) - LEVEL 2 ASSESSMENT

Sources-purchased water						
6.27	Water quality issues with supplier?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
6.28	Low disinfectant residual from supplier (typically ≤ 0.2 mg/L)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
6.29	Any other purchased water issues not previously mentioned above?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Applicable to all sources						
6.30	Has an unapproved source been used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
6.31	Has there been a change in sources?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6.32	Has there been recent rapid snowmelt, heavy rainfall or flooding?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
6.33	Any evidence of animals near the source?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
6.34	Have there been changes in available source water (e.g. significant drop in water table, reservoir capacity)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6.35	Is the source water sample for ground water systems E. coli positive? This may indicate that the positive sample is originating from the source and may be a continuous source of contamination.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6.36	Any other source issues not previously mentioned above?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
7. General Operations						
7.1	During or soon after bacteriological quality problems, did you receive any complaints of any customers' illness suspected of being waterborne? How many?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
7.2	What were the symptoms of illness if you received complaints about customers being sick?	N/A				
7.3	Were there any extreme weather/natural events (e.g. heat, freezing, raining, wind, fires, earthquakes etc)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
8. Significant Deficiencies						
8.1	Are there any unaddressed significant deficiencies? This may indicate that the problem is known and is in the process of being remedied. Include approved corrective action date and status of each corrective action.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
1. Attach additional sheets if needed.						

used press water to be able to flush water in restrooms
Rats

See Sanitary Survey To Do list

REVISED TOTAL COLIFORM RULE (RCR) - LEVEL 2 ASSESSMENT

Additional Comments:

The accidental opening of "Quarry Crusher" ball valves caused high flows through the storage tank. Not enough contact time of water with chlorine may have caused positive bacteriological results. Other deficiencies mentioned in the sanitary survey - do list must also be addressed.

Name of SWRCB-Division of Drinking Water or LPA representative completing the form (PRINTED): AAYUSH KADIANA

Signature: *Aayush Kadiana*

Date: 1/25/17

Water system responsible party (PRINTED): SCOTT MOORE

Signature: *Scott Moore*

Date: 25 JAN 17

Reserved for Regulatory Agency (DDW / LPA) Review

	Yes	No	Comments
1. Has assessment been successfully completed?	<input type="checkbox"/>	<input type="checkbox"/>	
2. Likely reason for EC+ occurrence has been found.	<input type="checkbox"/>	<input type="checkbox"/>	
3. System has corrected the problem.	<input type="checkbox"/>	<input type="checkbox"/>	
4. Were all issues identified corrected?	<input type="checkbox"/>	<input type="checkbox"/>	
4. Corrective Action Approved?	<input type="checkbox"/>	<input type="checkbox"/>	

Enclosure B

Investigative Report by Brian Males



1/23/17

Mr. Jesse Dhaliwal, Senior Sanitary Engineer
Tehachapi District
Division of Drinking Water
State Water Resources Control Board
4925 Commerce Drive, Suite 120
Bakersfield, CA 93309

Subject: Report of Activities since October 2016

Dear Mr. Dhaliwal

Enclosed is a timeline of the activities conducted at the CalPortland Company, Mojave facility prior to and following the positive BACT samples collected in December 2016.

1. October 20, 2016, it was noticed that the potable water tank level had begun to diminish and the that the well was having a difficult time in filling it
2. October 22, 2016, noticeable reduction in Cl residual
3. October 25, 2016, due to the inability to increase the potable water tanks level, it was determined that there was insufficient retention time to properly disinfect the available water, therefore, "Do Not Drink" signs were posted on sinks and water fountains in all departments as a preemptive measure due to the critical levels of potable water. All employees have been provided Sparklett's Drinking Water for years, therefore, prior to and following the posting of the "Do Not Drink" signs all employees have been provided safe drinking water
4. November 15, 2016, received notice from Zalco Laboratories of an "Absent" test result for Total Coliform and E. coli for the sample collected from the Lab Sink on November 8 2016
5. Following test results listed in item 4, physical testing throughout the plant continued; equipment areas were identified as potential consumers of potable water, therefore, Cl testing were conducted on areas of suspected potable water consumption in an attempt to identify the source of the excess potable water consumption.
6. December 9, 2016, notified by Zalco Laboratories of the "present" result for Total Coliform for the sample collected from the Safety Sink on December 7, 2016; upon receiving this notice, repeat samples were collected on the afternoon of December 9, 2016 per the CA Total Coliform Rule -- rTCR Interim Requirement Summary table located at www.waterboards.ca.gov "for systems collecting one routine sample per month"
7. December 10, 2016, notified by Zalco Laboratories of the "Present" result from the repeat samples collected on December 9, 2016. At this point "Do Not Drink" signs had been posted at all sinks and drinking fountains throughout the facility since



October 25, 2016, and Sparklett's Drinking Water continued to be provided to all employees. Additional "Do Not Use" signs were posted throughout the facility to include eyewash stations and safety showers. In lieu of stationary eyewash stations and safety showers, portable, self-contained eyewash stations and safety showers were put in place as a replacement.

8. Following the "Present" test results, a top priority was placed on locating the source of potable water consumption and correcting it. Cl testing became a key indicator in the search for the excess consumption. The plant water conveyance is made up of two independent water lines defined as the "Domestic Water" (DW) and "Process Water" (PW). The assumption was that if the free Cl could be found in the process water line, where there should be zero, then the source could be located and corrected.
9. Through the testing described in item 8, there was found to be two ball valves located in a very obscure, lightly traveled portion of the facility (Quarry Crusher Basement) had been opened, creating a cross tie between the two (process and potable) water systems. These valves were closed and the potable water system immediately began to recover. The ball valves described above have since remained closed, and one has been locked out (only one required to be locked to secure the tie in) and the key is maintained with the facilities potable water lock out system.
10. Since January 4, 2016, the potable water tank has maintained the level required to properly disinfect. To date, no additional lab samples have collected, however, prior to sampling the plan was as follows;
 - A. Super chlorinate the tank (complete)
 - B. Purge/Flush lines
 - C. Repeat sampling
11. SEACO Technologies, Inc. has been contracted as the Distribution Operator and will plan, develop, and oversee that the necessary steps are taken in order to mitigate the contaminant(s) to ensure the potable water is returned to safe drinking standards

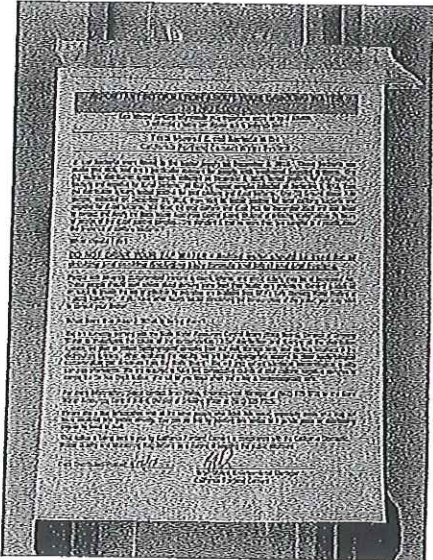
If you or your staff should have any questions regarding any item listed above, please do not hesitate to contact me via telephone (661) 823-3731 or email bmales@calportland.com.

Sincerely,

Brian Males
Environmental Manager
CalPortland Company
Mojave Plant

Enclosure C

**Level 2 Assessment Pictures
(Taken on Jan. 25, 2017)**



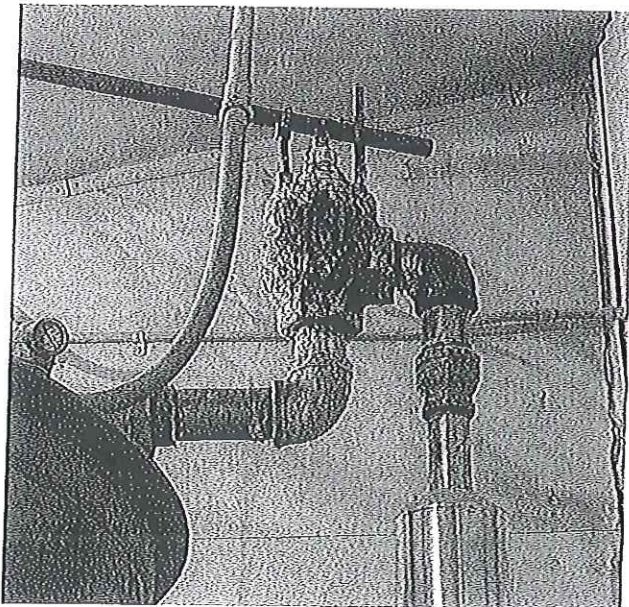
Picture 1

Do Not Drink notices were up near drinking water facilities.



Picture 2

The overflow/drain line does not have a protective screen.



Picture 3

The valve on inlet line of the tank in the booster station room is rusted and leaking.

**APPENDIX 3. State Board's Email dated January 11, 2017, with Tier 1 Public Notice
For Citation No. 03_19_17C_042**

Amtey, Nivedita@Waterboards

From: Dhaliwal, Jesse@Waterboards
Sent: Wednesday, January 11, 2017 4:35 PM
To: bmales@calportland.com
Cc: Tehachapi District (DWPDIST19@waterboards.ca.gov); Maynard, Zechariah A. @Waterboards; aayush.khurana@waterboards.ca.gov
Subject: Tier 1 Do Not Drink Notice - California Portland Cement Water System (System No. 1502034)
Attachments: Sampling Services With Certified Distribution & Treatment Operators in K....pdf; Proof of Notification - Dec 2016-CA Portland Cement.doc; Tier 1 Do Not Drink Notice 01.11.2017-CA Portland Cement-1502034.doc

Tracking:	Recipient	Read
	bmales@calportland.com	
	Tehachapi District (DWPDIST19@waterboards.ca.gov)	Read: 1/11/2017 4:46 PM
	Maynard, Zechariah A.@Waterboards	Read: 1/11/2017 4:47 PM
	aayush.khurana@waterboards.ca.gov	
	Khurana, Aayush@Waterboards	Read: 1/11/2017 4:50 PM

Attention: Brian Males, Environmental Manager
California Portland Cement

Dear Mr. Males,

This is in follow-up to our phone conversation today regarding the total coliform and *E. coli* Maximum Contaminant Level (MCL) failure of the California Portland Cement Water System (hereinafter Water System) for December 2016. As we discussed today, a routine total coliform sample collected on December 6, 2016, from the distribution system, tested positive for total coliform bacteria and negative for *E.coli* bacteria. On December 9, 2016, the Water System collected four (4) repeat samples from the distribution system, and all four (4) repeat samples tested positive for total coliform and *E. coli* bacteria. The standard is no more than one (1) sample per month may show the presence of total coliform bacteria and/or *E. coli* bacteria. Therefore, the State Water Resources Control Board (hereinafter State Board), Division of Drinking Water has determined that California Portland Cement Water System failed the MCL for total coliform bacteria and *E. coli* bacteria for December 2016 (violation of Section 64426.1(b)(2) and Section 64426.1(b)(3), Title 22, CCR) and the total coliform treatment trigger and *E.coli* MCL violation under the federal revised Total Coliform Rule (rTCR) which went into effect on April 1, 2016. The Water System also failed to comply with the Ground Water Rule, and did not collect a source trigger sample from the active Well(s) until December 27, 2016, and the sample collected from the Well 6, tested positive for total coliform bacteria and negative for total coliform bacteria. A source sample collected on December 27, 2016, from Well 05-Standby tested negative for total coliform bacteria. No further sampling from the distribution system or sources was conducted.

It is noted that the Water System failed to notify the State Board of the total coliform and *E. coli* MCL violation for December 2016 until after Aayush Khurana from the State Board conducted a sanitary survey of the Water System on January 10, 2017. The Water System was required to notify the State Board of the above-mentioned violations, within 24 hours of receipt of notification of the results of the repeat total coliform and *E. coli* positive sample(s), collected on December 9, 2016. Therefore, the State Board has determined that the Water System also failed to comply with the notification requirements to the State Board, specified in Title 22, California Code of Regulations.

It is also noted that the State Board did not receive any copies of the results of the total coliform and *E.coli* positive samples until today, after making a phone contact with you. Per our discussion today, the Water System uses Zalco

Lab to collect and analyze the bacteriological samples. Section 64423.1(c)(2), Title 22, CCR requires the Water System to have the laboratory submit copies of all required bacteriological monitoring results directly to the State Board. Please make arrangements with the Zalco Lab to directly report the results to the State Board, in the future.

Due to the *E.coli* positive samples from December 2016, Tier 1 Do Not Drink Notice (DND) is required to be posted and distributed to all persons served by the Water System. During our conversation today, you stated that you issued a Do Not Drink notice after the Water System experienced low pressure in October 2016, due to accidentally opening a valve which may have allowed the process water to enter the potable water distribution system and that notice is apparently still posted. Please make sure to now post the Tier 1 DND notice that the State Board is issuing for posting at all conspicuous locations within service area of the Water System. Attached is the **Tier 1 DND notice** for distribution to the persons served by the Water System and posting. Please date and sign the DND notice before posting and distribution, within 24 hours of issuance. After posting and distribution, please send a copy of the Tier 1 DND notice to the State Board via email (dwpdist19@waterboards.ca.gov) or fax: 661-335-7316. Also attached is the proof of notification form that needs to be completed and submitted to the State Board at the same time.

The Tier 1 DND notice will remain in effect until the Water System has two consecutive rounds of total coliform negative samples from the distribution system. The Water System provides continuous chlorination treatment. Please make sure that the chlorination treatment is working properly and maintain a residual between 1 and 2 mg/L until the contamination is cleared. The chlorine residual at the injection point and in the distribution system should be checked daily and a log of the chlorine residuals should be maintained. Flushing should be also conducted in the distribution system, under the supervision of a certified distribution grade 1 operator to help clear contamination. Afterwards, collect the two rounds of bacteriological samples which should include samples from all five routine locations in the distribution system, a sample from the system storage tank and a sample from Well 06. All domestic water supply facilities should be inspected including the storage tank. Upon successful completion of two consecutive rounds of total coliform negative samples, the State Board will make a determination about canceling the Tier 1 DND notice. Due to the *E.coli* MCL violation under the rTCR, the Water System is required to have a Level 2 Assessment completed. Mr. Khurana from the State Board will contact you to schedule the Level 2 Assessment, sometime next week. The State Board will also review findings of the Level 2 Assessment when making a determination about canceling the Tier 1 DND notice. As we discussed today, also submit a detailed report to the State Board, explaining the events and problems that started in October 2016 and the steps you took to address those problems. It is possible that *E.coli* positive samples may have been caused by the cross-connection with the process (industrial) system. During our conversation you stated that bottled water is being provided and will continue to be provided for drinking.

The California Portland Cement Water System is classified as a D1 Water System; therefore, the Water System is required to have a designated certified operator, classified as a D1 operator or higher. Currently, the Water System is in violation of this requirement as there is no D1 certified operator employed by the Water System or on contract with the Water System. A list of certified distribution operators is attached per your request.

To document the total coliform and *E. coli* MCL failure for December 2016 and failure to notify the State Board of the total coliform and *E.coli* MCL violations for December 2016, the State Board will issue a citation in the near future. The citation will include discussion on specifics of the violation(s) of the total coliform rule and may include a civil penalty also. Please contact our office if you have any questions. Thanks.

Jesse Dhaliwal, P.E.
Senior Sanitary Engineer
Tehachapi District
Division of Drinking Water
State Water Resources Control Board
4925 Commerce Drive, Suite 120
Bakersfield, CA 93309
Phone: 661-335-7318
Fax: 661-335-7316

Email: jesse.dhaliwal@waterboards.ca.gov



APPENDIX 4. Report Showing a Summary of Bacteriological Results
(January 2016 - October 2017)
For Citation No. 03_19_17C_042

California Portland Cement

1502034

Distribution System Freq: 1/M

Sample Date	Time	Location	T Coli	E Coli	F Coli	Type	Cl2	Violation	Comment
1/18/2016	10:05	Lab Sink	A	A		Routine			
2/10/2016	14:10	Safety Sink	A	A		Routine			
3/7/2016	12:55	Engineering Sink	A	A		Routine			
4/26/2016	12:47	Central Sink	A	A		Routine			
5/10/2016	10:45	Garage Sink	A	A		Routine			
6/15/2016	9:52	Lab Sink	A	A		Routine			
7/20/2016	13:30	Safety Sink	A	A		Routine			
8/23/2016	10:57	Engineering Sink	A	A		Routine			
9/28/2016	9:40	Central Sink	A	A		Routine			
10/19/2016	3:15	Garage Sink	A	A		Routine			
11/8/2016	11:15	Lab Sink	A	A		Routine			
12/6/2016	16:10	Safety Sink	P	A		Routine			
12/9/2016	14:50	Office Sink	P	P		Repeat		MCL	Citation 03_19_17C_042
12/9/2016	14:56	Lab Sink	P	P		Repeat			
12/9/2016	15:00	Engineering Sink	P	P		Repeat			
12/9/2016	15:05	Safety Sink	P	P		Repeat			
1/26/2017	14:20	Storage Tank	A	A		Routine	1.52		
1/26/2017	14:30	Lab	A	A		Routine	1.09		
1/26/2017	14:40	Safety Room	A	A		Routine	0.36		
1/26/2017	14:50	Garage	A	A		Routine	1.88		
1/26/2017	15:05	Central Control	A	A		Routine	1.96		
1/26/2017	15:15	Engineering	A	A		Routine	1.39		
2/2/2017	12:55	Storage Tank	A	A		Routine	0.4		
2/2/2017	13:05	Laboratory	A	A		Routine	0.51		
2/2/2017	13:10	Safety Office	A	A		Routine	0.19		
2/2/2017	13:15	Engineering	A	A		Routine	0.39		
2/2/2017	13:25	Garage	A	A		Routine	0.61		
2/2/2017	13:45	Central Control	A	A		Routine	0.53		
3/15/2017	16:10	First Aid	A	A		Routine	0.61		
4/27/2017	14:50	Central Control	A	A		Routine	1.17		
5/30/2017	15:50	Garage Sink	A	A		Routine	0.76		
6/28/2017	8:45	Lab	A	A		Routine	1.71		
7/27/2017	13:40	Engineering	A	A		Routine	0.31		
8/29/2017	10:00	First Aid	A	A		Routine	0.91		
9/26/2017	16:30	Central Control Sin	A	A		Routine	0.82		
10/31/2017	10:00	Garage Sink	A	A		Routine	1.02		

California Portland Cement

1502034

Source Monitoring Freq: 1/M

<i>Sample Date</i>	<i>Time</i>	<i>Source</i>	<i>T Coli</i>	<i>E Coli</i>	<i>F Coli</i>	<i>Violation</i>	<i>Comment</i>
12/27/2016	12:45	Well 06	P	A			GWR Sample
12/27/2016	12:55	Well 05 - Standby	A	A			
1/26/2017	14:00	Well 006 / Routine	<1.1	<1.1			
2/2/2017	12:30	Well #006 / Routine	<1	<1			
3/15/2017	15:00	Well #006 / Routine	A	A			
4/27/2017	15:30	Well #006 / Routine	A	A			
5/30/2017	15:30	Well #006 / Routine	A	A			
6/28/2017	9:15	Well #006 / Routine	A	A			
7/27/2017	14:20	Well #006 / Routine	<1	<1			
8/29/2017	9:25	Well 006 / Routine	<1	<1			
9/26/2017	15:35	Well 006 / Routine	<1	<1			
10/31/2017	10:55	Well #006 / Routine	A	A			